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Bridgeport, CT 06606
May 30, 2001

Kimberly Topper
Center for Drug Evaluation and Research (HFD-21)
Food and Drug Administration
5600 Fishers Lane
Rockville, MD 20857

Dear Ms Topper,

I have in my possession information from the Federal Register (May 3, 2001, Vol. 66, #86) titled Anesthetic and Life Support Drugs Advisory Committee: Notice of Meeting. Apparently this meeting is to discuss the use of opiate analgesics in various patient populations, including patients with chronic pain of nonmalignant etiology. Another issue to be discussed is the issue regarding the abuse potential, diversion and increasing incidence of addiction to opiate analgesics.

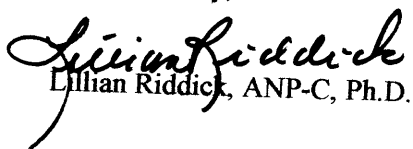
There is evidence that approximately 5% of patients who use prescription analgesics of the narcotic nature become addicted. From my experience as a substance abuse advance practice nurse, most patient who abuse these drugs are able to purchase them from non-health care sources. This is the area that that government should direct effort in restricting misuse. It is also understandable that health care providers often prescribe narcotics unnecessarily and abuse their prescriptive authority. They should be dealt with severely.

To prevent other patients from adequate pain relief is inhuman. As a health care provider, I have concerns about the limitations that this will place on patients who have chronic pain due to the nature of their illness other than surgery and malignancy. There are documented illnesses that cause excruciating pain. My job as an advanced practice nurse is to detoxify substance abusers. Many know that they abuse the opportunity of being able to obtain drugs freely. However, it goes beyond that activity. Once the provider limits or cut off the source it is no problem obtaining the drugs from the streets. To limit the use to those cases listed will only potentate illicit purchase of the medications. As many of my patients point out, obtaining oxycontin or any other narcotic is not a major problem. If this is the case, why restrict others who need pain therapy?

Among other disease that narcotics are needed and used are severe neurological disease, sickle cell crisis (these patients are in pain most of the time), connective diseases, non-malignant tumors, and diseases of the bone and joints.

I urge the committee to examine the issues thoroughly and not deprive other from pain relief. Do not revert back to the time when nothing was available to treat pain. There is already too much man's inhumanity to man in this world.

Most sincerely,


Lillian Riddick, ANP-C, Ph.D.